

485 Lexington Ave
New York, NY 10017-2643
212.977.9700
Fax 212.262.5152

Mark M. Elliott
(212) 841-0741
melliott@phillipsnizer.com

Continental Plaza
433 Hackensack Avenue
Suite 803
Hackensack, NJ 07601
201.487.3700

www.phillipsnizer.com

New York • New Jersey

January 14, 2022

VIA ECF

Honorable Vincent Marrero
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Civil Rights Corps, et al. v. Georgia Pestana, et al.*, 21-cv-9128 (VM)

Dear Judge Marrero:

This firm represents Defendant Diana Maxfield Kearse (“Kearse”) in the above-referenced action. I write in response to Plaintiffs’ motion to unseal Exhibits 1 through 7 (the “Exhibits”) of the Complaint (ECF #1, #9). Kearse adopts the arguments made in Defendants Andrea E. Bonina and Hector LaSalle’s letter dated January 14, 2022 (ECF #48) and in Defendants Georgia Pestana and Melinda Katz’s letter dated January 14, 2022 (ECF #49) in opposition to Plaintiffs’ motion.

Very truly yours,

/s/ Mark M. Elliott
Mark M. Elliott

Cc: All parties (via ECF)